

Sheldrake, Sean

From: BAYUK Dana <BAYUK.Dana@deq.state.or.us>
Sent: Tuesday, April 28, 2015 3:23 PM
To: Bob Wyatt
Cc: Patty Dost; John Edwards; Ben Hung; John Renda; Rob Ede; Earle, William G. (WEARLE@davisrothwell.com); Ilene Gaekwad [igaekwad@davisrothwell.com]; James Peale; Sheldrake, Sean; Muza, Richard; 'Lance Peterson (PetersonLE@cdmsmith.com)'; 'Coffey, Scott'; JOHNSON Keith; HAFLEY Dan; LARSEN Henning
Subject: NW Natural, HC&C System Phase 1 Testing Summary Report Comments
Attachments: DEQ_Comments-NWN_Ph1_Testing_Report-28Apr15.pdf; EPA Comments on 1-30-15 Phase 1 Data Summary Report_27_APR_15.pdf

Good afternoon Bob.

DEQ reviewed the "Groundwater Source Control Phase 1 Testing Data Summary Report, NW Natural Gasco Site" dated January 30, 2015 (Phase 1 Summary Report). The Phase 1 Summary Report presents and evaluates the results of the HC&C system Phase 1 Step 6 test, including comparing the test data to data collection objectives identified in the Final Test Plan^[1] and recommending HC&C system operational parameters for the Phase 2 testing period. Anchor QEA, LLC prepared the Phase 1 Summary Report for NW Natural.

The primary purpose of this letter is to inform NW Natural that DEQ:

- Considers the Phase 1 Summary Report to be incomplete; and
- Requests that NW Natural prepare a supplement to the document as indicated in our attached letter.

In addition to DEQ, EPA reviewed the Phase 1 Summary Report. EPA concurs with DEQ's comments provided in the attached letter and our request for the supplement. EPA has also provided comments which are attached.

DEQ requests the Phase 1 Summary Report Supplement to be submitted for review on or before Friday June 15, 2015. DEQ's approval of the supplement is needed before NW Natural moves from the approved 60-day Phase 2 testing period into the longer period of Phase 2 testing. Given the date for submitting the supplement and the current Phase 2 testing schedule, DEQ recommends that a meeting be scheduled as soon as practicable to further discuss the contents of the supplement.

DEQ acknowledges and continues to appreciate the groundwater source control work being done by NW Natural. Please contact me if you have questions regarding this e-mail or the attachments and hope the rest of your day goes well.

Dana

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Please visit our website at <http://www.oregon.gov/DEQ/>

This spring, DEQ's Northwest Region Office will be moving to a new location - the 700 Lloyd Building at 700 NE Multnomah St., Suite #600, Portland, OR 97232. The date for operating at the new location is May 18th, 2015



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^[1] Anchor QEA, LLC, 2013, "Final Groundwater Source Control Extraction System Test Plan – NW Natural Gasco Site," November (received November 13, 2013), a document prepared for NW Natural.